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February 8, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: *Reporting Requirements for U.S. Providers of International Telecommunications Services, IB Docket No. 04-112*

Dear Ms. Dortch:

As follow up to AT&T's January 11, 2012 meeting with staff, James Talbot of AT&T yesterday sent an email to James Ball, Cathy Hsu, David Krech and Mark Uretsky of the International Bureau, stating the following:

At our recent meeting, you asked whether AT&T would support the reporting of active and idle submarine cable circuit capacity in the cable circuit status report on a cable-specific basis, rather than on a country-specific basis as presently required. We have discussed this proposed change with our reporting team and have learned that it would increase the difficulties of reporting active circuits in the annual report, since the information systems we use to obtain active circuit information identify these circuits by country and not by cable. We would therefore much prefer to continue to report this information on a country-specific basis.

In response to your further question regarding the cable system capacity information provided in Table 7 of the current cable circuit status report, we do not oppose codifying the reporting of this information, provided it is recognized that the forecasted capacity for future years that is included in existing Table 7 is always subject to change. In our experience, projected capacity increases may not occur on schedule or to the same extent as the result of intervening events that may delay planned upgrades or because of changes in business plans. Any codification of this reporting should therefore allow details of forecasted capacity to be submitted as best estimates.

An additional concern is that all licensees may not have this capacity information on all cables. For example, AT&T normally has this information for the consortium cables for which it is the U.S. landing party, but does not have this information for two private

cables for which it is the U.S. landing party. Also, some cables have more than one U.S. landing party. To allow sufficient flexibility to address these different situations, any codification of this reporting should allow licensees on cables with more than one licensee to arrange for one licensee to report this information.

One electronic copy of this Notice is being submitted in the above-referenced proceedings in accordance with Section 1.1206 of the Commission's rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. Alvarez". The signature is fluid and cursive, with a large, stylized "A" and a long, sweeping tail that loops back under the name.

cc: James Ball
Cathy Hsu
David Krech
Mark Uretsky